

EJK:SCF

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M-11-629

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UNITED STATES OF AMERICA

PRE-ARRAIGNMENT
C O M P L A I N T

- against -

ALEX HUMBERTO PICHARDO,
Defendant.

(21 U.S.C. §§ 952(a)
and 960)

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EASTERN DISTRICT OF NEW YORK, SS:

MATTHEW DOYLE, being duly sworn, deposes and states that he is a Special Agent with Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

Upon information and belief, on or about June 18, 2011, within the Eastern District of New York and elsewhere, defendant ALEX HUMBERTO PICHARDO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

^{1/} Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant

1. On June 18, 2011, defendant ALEX HUMBERTO PICHARDO arrived at John F. Kennedy International Airport in Queens, New York, aboard American Airlines Flight No. 1780 from Santiago, Dominican Republic.

2. Customs Inspectors approached defendant PICHARDO for an inspection. During that inspection, officers determined that PICHARDO is a United States Citizen who currently resides in the Dominican Republic. In response to questioning, defendant PICHARDO stated that the purpose of his travel to the United States was to visit his cousin in Peekskill, New York. However, the defendant was unable to provide a phone number for his cousin. Defendant then stated that he was visiting the United States to purchase car parts for his business in the Dominican Republic. The defendant appeared visibly nervous during the questioning by Customs Inspectors.

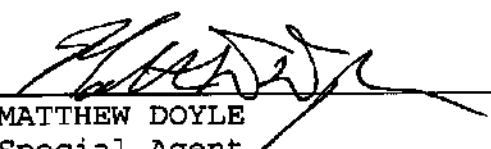
3. Customs Inspectors at this point considered PICHARDO a possible internal narcotics courier. PICHARDO was transported to the medical facility at John F. Kennedy International Airport for an x-ray examination of his intestinal tract. The x-ray was positive for the presence of foreign bodies.

facts and circumstances of which I am aware.

4. At 9:55 p.m., PICHARDO passed ten pellets, one of which was probed and tested positive for the presence of heroin.

5. Defendant ALEX HUMBERTO PICHARDO will be detained at the JFK medical facility until such time as he has passed all the pellets contained within his intestinal tract.

WHEREFORE, your deponent respectfully requests that the defendant ALEX HUMBERTO PICHARDO be dealt with according to law.


MATTHEW DOYLE
Special Agent
Homeland Security Investigations

Sworn to before me this
20th day of June, 2011

UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK